

### **REMARKS**

Claims 38-47 are pending, with claim 38 being independent. Claims 1-37 have been cancelled. Claims 38-47 have been added. No new subject matter has been added.

While Applicants disagree with the current rejections, Applicants have cancelled claims 1-37 and prepared new claims 38-47 to expedite prosecution. Applicants reserve the right to pursue claims 1-37 as originally filed in one or more continuing applications. Support for the new claims can be found throughout the written description, claims, and drawings as originally filed. Therefore, no new matter has been added. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **CLAIM OBJECTIONS**

Claims 1, 20 and 25-28 stand objected to by the Examiner. Claims 1, 20 and 25-28 have been cancelled. Therefore, reconsideration and withdrawal of this objection are respectfully requested.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1 and 20-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tepman et al. '224 (U.S. Pat. No. 5,589,224) in view of Tepman et al. '977 (U.S. Pat. No. 5,803,977), and Chung et al. (U.S. Pat. No. 6,171,453). This rejection is respectfully traversed.

Claim 1 and 20-37 have been cancelled.

With respect to Claim new 38, none of the references of record show, teach, or suggest a pedestal shield comprising a first portion removably attachable to an edge of

the pedestal and extending horizontally a first distance away from the pedestal and a first arcuate portion having a first end, a second end, a concave side and a convex side. The first end of the first arcuate portion extends from the first portion. The pedestal shield resides below a top surface plane of the pedestal. The concave side of the first arcuate portion opens vertically towards a top of the chamber. A sidewall shield comprises a second portion extending downwardly from an upper portion of the chamber and a second arcuate portion having a first end, a second end, a concave side and a convex side. The first end of the second arcuate portion extends from the second portion. The concave side of the second arcuate portion opens vertically towards a bottom of the chamber. When the sputter target and the pedestal are moved to the processing position, the second end of the first arcuate portion is positioned vertically above and between the first end and the second end of the second arcuate portion, and the second end of the second arcuate portion is positioned vertically below and between the first end and the second end of the first arcuate portion.

With respect to Tepman et al. '224, the sidewall shield does not include arcuate sections as recited in claim 38. Furthermore, the second end of the pedestal shield is not located vertically below and between the first and second ends of an arcuate portion of the sidewall shield. Rather, the second end of the pedestal shield runs adjacent to the sidewall shield and is not located between any part of the sidewall shield.

With respect to Tepman et al. '977, portions of the pedestal shield are located above a plane defined by the pedestal. Furthermore, an opening defined by the pedestal shield points vertically downward and an opening defined by the sidewall shield points

vertically upward, which is opposite of the shield system recited in claim 38. Neither the pedestal shield nor the sidewall shield includes arcuate sections as recited in claim 38.

Chung et al. do not remedy the shortcomings of the Tepman et al. references.

Therefore Claim 38 has limitations not taught by any of the applied references.

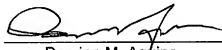
Dependent claims 39-47 ultimately depend from claim 38 and are therefore allowable for at least similar reasons.

#### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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